

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LUIGI WARREN,

Plaintiff,

vs.

THE CHILDREN'S HOSPITAL
CORPORATION,

Defendant.

Civ. A. No. 17-12472-DLC

DEFENDANT'S ASSENTED-TO MOTION FOR EXTENSION OF TIME

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), the defendant, The Children's Hospital Corporation ("BCH"), moves for an extension of time to April 16, 2020 to respond to the Motion for Leave to File a First Amended Complaint by the plaintiff, Dr. Luigi Warren. In support of this motion, the defendant states as follows:

1. On March 3, 2020, Dr. Warren filed his Motion for Leave to File a First Amended Complaint. Per Local Rule 7.1(b)(2), BCH's opposition to Dr. Warren's motion is presently due on March 18, 2020.
2. The undersigned counsel has a trial scheduled from March 11 to March 25, 2020 in California. Because counsel will be busy on another matter out of state, good cause exists for the Court to grant a brief thirty-day extension.

For the foregoing reasons, BCH respectfully requests that the Court grant this motion and extend the time to respond to Dr. Warren's Motion for Leave to File a First Amended Complaint to April 17, 2020. The plaintiff has assented to this motion.

Respectfully submitted,

THE CHILDREN'S HOSPITAL CORPORATION

By its attorneys:

/s/ Theodore J. Folkman

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Dated: March 5, 2020

LOCAL RULE 7.1 CERTIFICATE

I certify that on March 4, 2020, I conferred with the plaintiff by email in a good-faith attempt to resolve or narrow the issue presented by this motion.

/s/ Theodore J. Folkman _____